

EXHIBIT A:
Microsoft's Claim Construction Comparison Chart
for U.S. Patent No. 6,826,744 B1

Disputed Terms in the '744 Patent	Microsoft's Construction	Vertical's Construction
1. A method for generating a computer application on a host system in an arbitrary object framework that separates a content of said computer application, a form of said computer application and a functionality of said computer application, said method comprising:	<p>“arbitrary object framework”: This term is indefinite. To the extent that the term can be given any meaning, Microsoft proposes that it mean:</p> <p>“A framework that allows arbitrary objects to be referenced in a consistent manner regardless of type.”</p>	<p>“arbitrary object framework”: A hierarchical system that can separate content, form and functionality to generate a product, and facilitates creation of arbitrary objects, management of arbitrary objects, and deployment of arbitrary objects.</p>
	<p>“functionality”: Software code or scripts to implement the actions of the computer application that can be created by a programmer or group of programmers.</p>	<p>“functionality”: Software code.</p>
	<p>“content”: Written, recorded, or illustrated documentation of the computer application, such as photographs, illustrations, product marketing material, and news articles that can be created by writers, photographers, artists, reporters, or editors.</p>	<p>“content”: Data.</p>
	<p>“form”: The look of the computer application, including graphic designs, user interfaces, and graphical presentations that can be created by a designer or group of designers.</p>	<p>“form”: Formatting.</p>
	<p>“that separates a content of said computer application, a form of said computer application, and a functionality of said computer application”: In which the content, form and functionality of the computer application are entities that are independent of each other.</p> <p><u>Prosecution History Disavowal</u>: no class includes two or more of a content, a form, and a functional method.</p>	<p>“that separates a content of said computer application, a form of said computer application and a functionality of said computer application”: Treating content, form and functionality as arbitrary objects.</p>

Disputed Terms in the '744 Patent	Microsoft's Construction	Vertical's Construction
creating arbitrary objects with corresponding arbitrary names of various object types for generating said content of said computer application, said form of said computer application, and said functionality of said computer application;	<p>“object”: This term does not require a construction separate from the construction of “arbitrary object.”</p> <p>To the extent that the Court decides to construe this term separately, Microsoft proposes that it mean: “a combination of application logic and data.”</p>	<p>“object”: An entity that can have form, content or functionality or any combination of form, content and functionality.</p>
	<p>“arbitrary object”: Any combination of application logic and data desired by the developer that is interchangeable with another arbitrary object of another type.</p>	<p>“arbitrary object”: An object that can be created independently by individual preference and that can be accessed solely by name.</p>
	<p>“arbitrary name”: Any name desired by the developer that is all that is needed to access the object.</p>	<p>“arbitrary name”: An identifier assigned to an arbitrary object.</p>
	<p>“content”: <i>See above.</i></p>	<p>“content”: <i>See above.</i></p>
	<p>“form”: <i>See above.</i></p>	<p>“form”: <i>See above.</i></p>
	<p>“functionality”: <i>See above.</i></p>	<p>“functionality”: <i>See above.</i></p>
managing said arbitrary objects in an object library; and	<p>“arbitrary object”: <i>See above.</i></p>	<p>“arbitrary object”: <i>See above.</i></p>
deploying said arbitrary objects from said object library into a design framework to create said computer application.	<p>“arbitrary object”: <i>See above.</i></p>	<p>“arbitrary object”: <i>See above.</i></p>
26. A method for generating a website on a host system in an arbitrary object framework that separates a content of said website, a form of said website, and a functionality of said website, said method comprising:	<p>“arbitrary object framework”: This term is indefinite.</p> <p>To the extent that the term can be given any meaning, Microsoft proposes that it mean:</p> <p>“A framework that allows arbitrary objects to be referenced in a consistent manner regardless of type.”</p>	<p>“arbitrary object framework”: A hierarchical system that can separate content, form and functionality to generate a product, and facilitates creation of arbitrary objects, management of arbitrary objects, and deployment of arbitrary objects.</p>
	<p>“functionality”: Software code or scripts to implement the actions of the web site that can be created by a programmer or group of programmers.</p>	<p>“functionality”: Software code.</p>

Disputed Terms in the '744 Patent	Microsoft's Construction	Vertical's Construction
	<p>“content”: Written, recorded, or illustrated documentation of the web site, such as photographs, illustrations, product marketing material, and news articles that can be created by writers, photographers, artists, reporters, or editors.</p>	<p>“content”: Data.</p>
	<p>“form”: The look of the web site, including graphic designs, user interfaces, and graphical presentations that can be created by a designer or group of designers.</p>	<p>“form”: Formatting.</p>
	<p>“that separates a content of said website, a form of said website, and a functionality of said website”: In which the content, form and functionality of the web site are entities that are independent of each other.</p> <p><u>Prosecution History Disavowal</u>: no class includes two or more of a content, a form, and a functional method.</p>	<p>“that separates a content of said website, a form of said website and a functionality of said website”: Treating content, form and functionality as arbitrary objects.</p>
<p>creating arbitrary objects with corresponding arbitrary names of various object types for generating said content of said web site, said form of said web site, and said functionality of said web site;</p>	<p>“object”: This term does not require a construction separate from the construction of “arbitrary object.”</p> <p>To the extent that the Court decides to construe this term separately, Microsoft proposes that it mean: “a combination of application logic and data.”</p>	<p>“object”: An entity that can have form, content or functionality or any combination of form, content and functionality.</p>
	<p>“arbitrary object”: Any combination of application logic and data desired by the developer that is interchangeable with another arbitrary object of another type.</p>	<p>“arbitrary object”: An object that can be created independently by individual preference and that can be accessed solely by name.</p>
	<p>“arbitrary name”: Any name desired by the developer that is all that is needed to access the object.</p>	<p>“arbitrary name”: An identifier assigned to an arbitrary object.</p>
	<p>“content”: <i>See above.</i></p>	<p>“content”: <i>See above.</i></p>
	<p>“form”: <i>See above.</i></p>	<p>“form”: <i>See above.</i></p>
	<p>“functionality”: <i>See above.</i></p>	<p>“functionality”: <i>See above.</i></p>

Disputed Terms in the '744 Patent	Microsoft's Construction	Vertical's Construction
managing said arbitrary objects in an object library; and	“ arbitrary object ”: <i>See above.</i>	“ arbitrary object ”: <i>See above.</i>
deploying said arbitrary objects from said object library to a container page to create said web site.	“ arbitrary object ”: <i>See above.</i>	“ arbitrary object ”: <i>See above.</i>